

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF NEW YORK
In re: KRIS DANIEL ROGLIERI, Debtor
Chapter 7 Case No. 24- 10157- REL

2025 MAY -2 PM 3:43

CLERK OF THE
BANKRUPTCY COURT
N.D. OF NY
ALBANY

SUPPLEMENTAL DECLARATION OF KRIS D. ROGLIERI

IN RESPONSE TO TRUSTEE'S AFFIRMATION IN OPPOSITION (DOC. NO. 448)

I, Kris Daniel Roglieri, respectfully submit this supplemental declaration in response to the Trustee's Affirmation in Opposition to Debtor's Final Submission on Removal, filed as Doc. No. 448. The Trustee's filing contains multiple misstatements and omissions that must be corrected to ensure the Court receives a clear and accurate account. As the Debtor and as the individual with firsthand knowledge of the events in question, I submit this declaration to clarify the record and rebut the Trustee's mischaracterizations, particularly as they relate to Ms. Linda Oliver, my personal property, and actions taken by the Trustee without legal authority.

1. Residency of Ms. Linda Oliver

On May 23, 2024, I invited Trustee Christian Dribusch to my residence at 40 North Road for a walk-through. During that visit, I informed him that Ms. Linda Oliver, my girlfriend, was residing at the property full-time.

Additionally, on June 4, 2024, while present at the property, Trustee Dribusch can be heard on a recorded video and audio file stating: "I spoke to Ms. Oliver, who resides here." This evidence, already submitted to the Court via USB, confirms that the Trustee himself acknowledged her legal residency.

Further, USPS records, as shown in **Exhibit A**, show that on February 27, 2024, Ms. Oliver formally changed her mailing address to 40 North Road, establishing her as a legal resident of the property.

Ms. Oliver's residency is also supported by the July 7, 2024, hearing transcript see **Exhibit B**, where her legal residency was again affirmed.

Despite this, the Trustee falsely claimed in later filings that Ms. Oliver was merely "*storing clothes*" at the property. This is categorically untrue. Ms. Oliver lived at the residence full-time and had all her personal belongings in the home, including furniture, clothing, and daily-use items. She was the sole person maintaining and occupying the property after my May 31, 2024, incarceration.

Nonetheless, on June 12, 2024, Trustee Dribusch changed the locks to the residence without notice, without a court order, and without any lawful eviction proceeding—effectively removing her from her home in violation of due process and property rights.

2. Mail Forwarding

The Trustee's statement that Ms. Oliver forwarded my mail on June 9, 2024, is incorrect. As reflected in USPS records see **Exhibit A**, on June 9, 2024, Ms. Oliver submitted a change-of-address request for her mail to be forwarded from 40 North Road to 11 Hill Top Lane. On June 14, 2024, as my designated Power of Attorney, and at my direction, she submitted a separate request to forward my mail to the same address to ensure I would receive legal correspondence while incarcerated.

3. Unauthorized Entry and Lockout

On June 4 and 5, 2024, Trustee Dribusch entered the residence without a court order or providing notice to Ms. Oliver. The court did not authorize such entry until June 10, 2024. Despite this, the Trustee changed the locks on June 12, 2024, unlawfully locking Ms. Oliver out of the residence, stating in a previous court hearing that he did not know Ms. Oliver was a resident, changing his story multiple times. This action violated her established residency and occurred without a lawful process. Pursuant to New

York Real Property Actions and Proceedings Law (RPAPL) § 853, such conduct may entitle the wrongfully evicted party to treble damages.

4. Mischaracterization of Ms. Oliver's Actions

The Trustee's insinuations of theft by Ms. Oliver are false. While incarcerated, I asked her to gather a few clothing items, family photos, high school memorabilia, and my baby documents—deeply personal items I needed for court appearances and to share with my family, which I did not think would be an issue. Ms. Oliver ultimately returned all items to the SAM auctioneer. These were personal, not estate assets of significant value. The SAM auctioneer would not have returned them to Ms. Oliver if they had been considered valuable estate property. Ms. Oliver acted in good faith and solely on my behalf.

5. Trustee's Misrepresentations, June 7 Transcript, Text Messages, Evidence

Additionally, I wanted to address numerous inaccurate statements by Mr. Dribusch that are frankly deceptive to this Court and Your Honor. Aside from ignoring and failing to address in his response the cold, hard evidence that I provided—specifically, the video of Mr. Dribusch clearly stating on June 4, 2024, that he had broken into my home through the garage and that Ms. Oliver “resides” there—there is contradictory evidence located in the court hearing transcripts of Mr. Dribusch's (Exhibit B) that substantiate our claims that he committed violations by entering the home without a court order. At the hearing on June 7, 2024, in this very Court, Mr. Dribusch and the U.S. Trustee, Ms. Penpraze, asked the Court to grant “comfort orders” so that both the U.S. Trustee and Mr. Dribusch would have valid orders memorialized by the Court, ensuring there would be no dispute about Dribusch's power to enter the home at will—specifically because Ms. Linda Oliver was indeed acknowledged as a valid resident.

Please see **Exhibit B** for Mr. Dribusch's and Ms. Penpraze's responses. Such proposed orders, which were not granted until June 10, 2024, should have been in place prior to breaking and entering the home on June 4th and 5th, and on subsequent occasions, including when Mr. Dribusch willfully entered the house with third parties without giving any notice to Ms. Oliver, the lawful resident.

Furthermore, in the Trustee's sworn affirmation “Main Document” (*Doc. No. 448, p. 3, lines 12–14*), along with supporting text messages from Trustee, he directly coordinated with Ms. Oliver regarding Ms. Tina Roglieri's request to retrieve the children's belongings—acknowledging Ms. Oliver as the current resident and responsible party at the home. He also arranged for Ms. Oliver to receive a copy of the new house keys via our cleaning lady after the locks were changed, further reinforcing that she was the legal resident of the property with full right of access. See **Exhibit C and Exhibit D**.

6. Trustee's Selective Response Regarding Seized Property

In prior filings, we repeatedly raised concerns about the clothing that the Trustee and SAM auctioneer removed from the property, also omitting it from the seized asset list. Yet the Trustee does not mention the clothing in his Affirmation (*Doc. No. 448*). Instead, he selectively references only shoes and sunglasses, while avoiding any explanation or acknowledgment of the clothing taken. This omission is significant because clothing may be exempt under applicable law and is distinct from luxury accessories. The Trustee's failure to address the clothing's status, location, or disposition further supports our concern that material personal property was removed and remains unaccounted for. A complete and transparent accounting is required under the Trustee's fiduciary duty.

7. Exhibits Submitted in Support

I am submitting the following exhibits in support of this declaration to correct the record and rebut the misleading assertions made in (*Doc. No. 448*)

Exhibit A – USPS Mail Forwarding Confirmations

- Confirmation that Ms. Oliver changed her address to 40 North Road on February 27, 2024, establishing her legal residency
- Ms. Linda Oliver changed her address from 40 North Road to 11 Hill Top Lane on June 9, 2024
- I, Kris Roglieri, had my mail forwarded to the same address on June 14, 2024, under her authority as Power of Attorney.

Exhibit B – Transcript of the July 7, 2024, Hearing

- Confirms Ms. Oliver’s residency and notes the Trustee’s avoidance of formal turnover procedures (*Pages 8, 10, 11, 20, 21*)

Exhibit C – Excerpt from Trustee’s Affirmation (*Doc. No. 448, p. 3, lines 12–14*)

- Statement by Trustee Dribusch confirming he informed Ms. Oliver of Ms. Roglieri’s visit, then changed the locks—demonstrating his acknowledgment of Ms. Oliver’s residency at 40 North Road

Exhibit D – Text Messages Between Trustee Dribusch and Ms. Oliver

- Messages confirming the Trustee coordinated with Ms. Oliver regarding Ms. Roglieri’s request to retrieve her children’s belongings and arranged delivery of new house keys, acknowledging Ms. Oliver as the resident and point of contact at 40 North Road

Conclusion

This supplemental declaration is not an attempt to delay the administration of this case, but rather an effort to ensure that my rights—and the integrity of the bankruptcy process—are upheld. The Trustee’s assertion that my actions are disruptive or harmful to the Court is misleading and inappropriate. I am proceeding pro se, with no financial resources, and am simply trying to defend myself from overreach and abuse. The real harm comes not from a debtor raising valid objections, but from a Trustee who selectively discloses facts, ignores his fiduciary obligations, poses a real threat of a conflict of interest presiding over two bankruptcy cases related to the debtor, and uses his authority to marginalize those without power or representation. This case should serve as a reminder of why legal protections exist: to ensure fairness, transparency, and accountability—even when one party has significantly more power than the other. Trustees must be held to the highest standard because the system’s integrity depends on it.

Respectfully submitted,
Kris D. Roglieri, Debtor


By: Linda Oliver, Attorney-in-Fact (POA)
Dated: May 2, 2025

EXHIBIT A



LINDA OLIVER <lindaoliver@...>

Your USPS Change-of-Address Mover Savings

3 messages

U.S. Postal Service <ChangemyAddress@usps.gov>

Reply-To: no-reply@usps.gov

To: lindaoliver@...

Tue, Feb 27, 2024 at 7:58 PM

Change of Address:
TO: 40 North Road
Queensbury, NY 12800



Linda, you're eligible for these exclusive offers as part of your Change-of-Address submitted on February 27, 2024. Personal mail

Click below to view and redeem offers.

Access to the offers, via this email, will expire in 30 days from the date it was sent.

Get our Best Internet + TV deal with no contracts



Self-install kits are available to get you settled in sooner.

[Visit Site](#)

[Call 1-844-588-5583](#)

+ 16 FREE Meals & First Box Ships FREE**



[Claim Offer](#)

Not Changing Your Address?

For help or to contact us about an erroneous Change-of-Address, please call 1-800-ASK-USPS or visit usps.com and click on the Contact Us Link.

Receiving Duplicate Emails from Us?

This might be happening if:

- You filed more than one Change-of-Address order using the same email address;
- You share an email address with someone who also used this email address for their Change-of-Address.
- You moved more than once within the 12-month period. In this case, use the Order Submitted date at the top of this email to determine which Change-of-Address order this email applies to.

Unsubscribe

You are currently subscribed as lindaoliverofficial@gmail.com . We sent you this email because you filed a Change-of-Address with the U.S. Postal Service®. Please **click here to unsubscribe** if you no longer wish to receive USPS mail forwarding notifications.

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U.S. Postal Service <ChangemyAddress@usps.gov>

Reply-To: no-reply@usps.gov

To: lindaolive

Tue, Feb 27, 2024 at 8:03 PM



Oliver Group Management LLC, you're eligible for these exclusive offers as part of your Change-of-Address submitted on February 27, 2024.

Click below to view and redeem offers.

Access to the offers, via this email, will expire in 30 days from the date it was sent.



Hands On Masks LLC, you're eligible for these exclusive offers as part of your Change-of-Address submitted on February 27, 2024.

Click below to view and redeem offers.

Access to the offers, via this email, will expire in 30 days from the date it was sent.

MAKE YOUR MOVE WITH DIRECTV

DIRECTV

[View Offer](#)

[Call 855.621.3217](#)

+ 16 FREE Meals & First Box Ships FREE**



[Claim Offer](#)

Get up to \$600 for your new home.

Citizens

Switch to Citizens checking and savings, meet offer requirements and get paid¹.

Member FDIC. Expiration Date: 4/30/2024

[View Offer](#)



★ Official ★
Change-of-Address
Confirmation Letter
★

YOUR OLD ADDRESS

Mail will be forwarded for the
following individual only:

LINDA OLIVER

LINDA OLIVER
40 NORTH RD
QUEENSBURY NY 12804-2033

Your mail will be forwarded to your NEW address,
as you requested, on: JUN 9, 2024

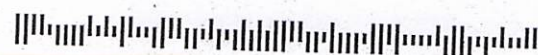
If you want to view or cancel this
Change-of-Address order or change the
date to start forwarding your mail, visit
managemymove.usps.com and enter your
Confirmation Code or scan the QR code to
get started.

CONFIRMATION CODE:
2416 1900 0027 9730



YOUR NEW ADDRESS

026 B852 00001033 00055831 1 1



LINDA OLIVER
11 HILL TOP LN
POUGHKEEPSIE NY 12603-6826

Don't miss any mail! Extend your Mail
Forwarding End Date now for \$19.95 for a
6-month extension, \$29.95 for a 12-month
extension, or \$39.95 for a 18-month extension.
To purchase Extended Mail Forwarding please
go to **managemymove.usps.com**.*

Extended Mail Forwarding



MAIL FORWARDING EXPIRATION DATES

First Class Mail®, Priority Mail® & Priority Express Mail®	Jun 9, 2025
Newspapers, Magazines	Aug 8, 2024
Packages ¹	Not Forwarded
Catalogs	Not Forwarded ²
Standard Mail	Not Forwarded ²

1. Some restrictions apply 2. Unless requested by mailer

Visit **managemymove.usps.com** to add your email address and receive email reminders of mail forwarding expiration dates.
If your change-of-address is correct and you have not received mail at your new address for 10 Postal business days or more,
please call **1-800-ASK-USPS** (1-800-275-8777).

IMPORTANT MESSAGES FROM THE U.S. POSTAL SERVICE REGARDING YOUR MAIL FORWARDING REQUEST

Please retain this Official Change-of-Address Confirmation page for your records
as logical agencies and/or resources may require it for proof of your move.



Remember to update your voter registration:

Even if you've previously registered to vote, you need to reregister
after you move (or if you change your last name). Filing a change-
of-address with the United States Postal Service **does not**
automatically update your voter registration information. To fill out
your voter registration form and receive a pre-addressed mailer,
visit **app.mymove.com/welcome** and enter code: 8ahq01vjmq

Note: North Dakota residents are not required to register to vote.

WHY THE YELLOW OR WHITE LABELS?

Yellow or White stickers with your new address are placed on
mail forwarded by the U.S. Postal Service. These labels indicate
the correspondent doesn't know your new address.

To receive your mail faster, notify the sender of your new address.

All of the paper used to produce the USPS® Official Change-of-Address
Confirmation Letter was sourced from sustainable forests.





JUN 10, 2024

managemymove.usps.com

CONFIRMATION CODE:

2416 1900 0029 0300

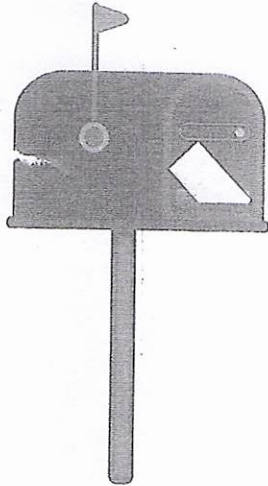
We will begin forwarding your mail to your NEW address on **JUN 9, 2024** as you requested. Your mail forwarding will end on **Jun 9, 2025**. Mail will be forwarded to the new address for THE FOLLOWING BUSINESS ONLY:

HANDS ON MASK LLC

**EXTENDED MAIL
FORWARDING**



Don't miss any mail! Extend your Mail Forwarding End Date now for \$19.95 for a 6-month extension, \$29.95 for a 12-month extension, or \$39.95 for a 18-month extension. To purchase Extended Mail Forwarding please go to **managemymove.usps.com.***



026 1849 00010103 00009287 T 000032 00000055



HANDS ON MASK LLC

11 HILL TOP LN

POUGHKEEPSIE NY 12603-6826

Hands On Mask LLC, Welcome to the neighborhood!

This letter is to confirm that the US Postal Service has received your PERMANENT change-of-address order. Please verify the following information is correct: address, dates, move type, and name. If you need to view, update, cancel, or extend this change-of-address order, please visit **managemymove.usps.com** and enter your confirmation code or scan the QR Code® to get started.

OLD ADDRESS

**HANDS ON MASK LLC
40 NORTH RD
QUEENSBURY NY 12804-2033**

NEW ADDRESS

**HANDS ON MASK LLC
11 HILL TOP LN
POUGHKEEPSIE NY 12603-6826**



Common Moving Questions

What should I do if I am not yet receiving mail at my new address?

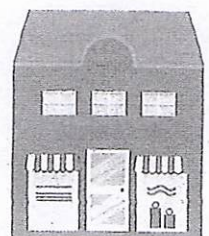
If you have not received forwarded mail (which would include a yellow or white sticker) 10 days from your start forwarding date, contact 1-800-ASK-USPS (1-800-275-8777).

How should I let my friends, family members, magazine publishers, and business correspondents know of my new address?

Usually, magazines and business correspondence contain cards or instructions for telling them your new address and move date. Please alert your friends and family members about your new address.

How should a business handle receiving mail for individuals that no longer work at this address?

An individual cannot complete a change-of-address from a business. To redirect these mail pieces, cross through the address and all barcodes (not the name) and write the correct address.



*If unable to purchase Extended Mail Forwarding online, please take this letter to your local USPS location. As required by law, the Postal Service does not provide customers names or addresses to third parties.



★ Official ★
Change-of-Address
Confirmation Letter
★

YOUR OLD ADDRESS

Mail will be forwarded for all persons
at the old address of the following business:
OLIVER GROUP MANAGEMENT LLC

OLIVER GROUP MANAGEMENT LLC
40 NORTH RD
QUEENSBURY NY 12804-2033

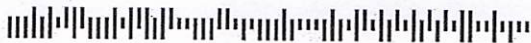
Your mail will be forwarded to your
NEW address, as you requested, on:

JUN 9, 2024

YOUR NEW ADDRESS

If you want to view or cancel this
change-of-address order or change the
date to start forwarding your mail, visit
managemymove.usps.com and enter your
Confirmation Code or scan the QR code to
get started.

026 B852 00001033 00055832 1 1



OLIVER GROUP MANAGEMENT LLC
11 HILL TOP LN
POUGHKEEPSIE NY 12603-6826

CONFIRMATION CODE:
2416 1900 0028 5200



Please retain this Official Change-of-
Address Confirmation page for your records
as local agencies and/or resources may
require it for proof of your move.

MAIL FORWARDING EXPIRATION DATES

Additional Business Alias Names

First Class Mail [®] , Priority Mail [®] & Priority Express Mail [®]	Jun 9, 2025
Newspapers, Magazines	Aug 8, 2024
Packages ¹	Not Forwarded
Catalogs	Not Forwarded ²
Standard Mail	Not Forwarded ²

1. Some restrictions apply 2. Unless requested by mailer

Don't miss any mail! Extend your Mail Forwarding End Date now
for \$19.95 for a 6-month extension, \$29.95 for a 12-month extension,
or \$39.95 for a 18-month extension. To purchase Extended Mail
Forwarding please go to managemymove.usps.com.*

Extended Mail Forwarding



Visit managemymove.usps.com to add your email
address and receive email reminders of mail
forwarding expiration dates. If your change-of-address
is correct and you have not received mail at your new
address for 10 Postal business days or more, please
call 1-800-ASK-USPS (1-800-275-8777).

*To begin your extension process, please take this letter to your local USPS location.

IMPORTANT MESSAGES FROM THE U.S. POSTAL SERVICE REGARDING YOUR MAIL FORWARDING REQUEST

Yellow or White stickers with your new address are placed on mail
forwarded by the U.S. Postal Service. These labels indicate the
correspondent doesn't know your new address.

To receive your mail faster, notify the sender of your new address





JUN 17, 2024

managemymove.usps.com

CONFIRMATION CODE:

2416 7900 0004 7010

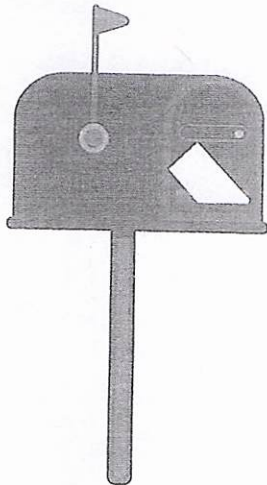
We will begin forwarding your mail to your NEW address on **JUN 14, 2024** as you requested. Your mail forwarding will end on **Jun 14, 2025**. Mail will be forwarded to the new address for THE FOLLOWING INDIVIDUAL ONLY:

KRIS DANIEL ROGLIERI

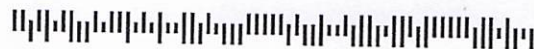
EXTENDED MAIL FORWARDING



Don't miss any mail! Extend your Mail Forwarding End Date now for \$19.95 for a 6-month extension, \$29.95 for a 12-month extension, or \$39.95 for a 18-month extension. To purchase Extended Mail Forwarding please go to managemymove.usps.com.*



026 1092 00010103 00008720 T 000028 00000048



KRIS DANIEL ROGLIERI

11 HILL TOP LN

POUGHKEEPSIE NY 12603-6826

Kris, Welcome to your new home and the neighborhood!

This letter is to confirm that the US Postal Service has received your PERMANENT change-of-address order. Please verify the following information is correct: address, dates, move type, and name. If you need to view, update, cancel, or extend this change-of-address order, please visit managemymove.usps.com and enter your confirmation code or scan the QR Code® to get started.

OLD ADDRESS

KRIS DANIEL ROGLIERI
40 NORTH RD
QUEENSBURY NY 12804-2033

NEW ADDRESS

KRIS DANIEL ROGLIERI
11 HILL TOP LN
POUGHKEEPSIE NY 12603-6826



Common Moving Questions

What should I do if I am not yet receiving mail at my new address?

If you have not received forwarded mail (which would include yellow or white sticker) 10 days from your start forwarding date, contact 1-800-ASK-USPS (1-800-275-8777).

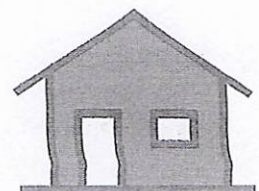
How should I let my friends, family members, magazine publishers, and business correspondents know of my new address?

Usually, magazines and business correspondence contain cards or instructions for telling them your new address and move date. Please alert your friends and family members about your new address.

Do I need to register to vote?

With a new address, you'll need to **reregister to vote** after you move (or if you change your last name). Filing a change-of-address **does not update** your voter registration information. To fill out your voter registration form and receive a pre-addressed mailer, visit app.mymove.com/welcome and enter code: 5eue43ignd

Note: North Dakota residents are not required to register to vote.



*If unable to purchase Extended Mail Forwarding online, please take this letter to your local USPS location. As required by law, the Postal Service does not provide customers names or addresses to third parties.

EXHIBIT B

1 THE COURT: Do we now have all the appearances?
2 Mr. Dribusch, you requested this hearing to, as I understand
3 it -- correct me if I'm wrong, to aid you in the turnover of
4 administration -- administrative process with perhaps some
5 more specificity in orders to give comfort to third parties
6 or whatever. And in a minute, I'd like you to elaborate on
7 that if you could.


8 You also -- and once again, correct me if I'm
9 wrong, we've set a 105 conference for next Wednesday
10 regarding authority of a lot of people to do a lot of
11 things. It seems that your motion today advances some part
12 of that, but once again, let me turn it over to you and you
13 can explain where you want us to go and what you want us to
14 do.

15 MR. DRIBUSCH: Absolutely. Thank you, Your Honor.
16 And you're accurate with respect to both points. There's
17 too big premises or issues that I'm seeking to resolve today
18 with respect to this motion. Part one deals with securing
19 assets of the bankruptcy estate pursuant to the turnover
20 order and otherwise our bankruptcy estate property. Those
21 are primarily located at the residence of Mr. Roglieri or
22 the bankruptcy estate now and 40 North Street.

23 And then the other aspect of it is going to be
24 dealing with the membership interest with respect to the
25 entities that are property of the bankruptcy estate.

1 MR. DRIBUSCH: In a secure location. They're
2 located right now at the Saratoga Auto Museum inside and
3 insured. The -- with respect to the residents, the
4 following day on Wednesday I did have a locksmith there and
5 we changed out the locks so that it secures the location
6 there.

7 I had the opportunity to coordinate with Mr.
8 Coleman, Ms. Roglieri's attorney, and I met with Ms.
9 Roglieri yesterday to remove some of the children's items
10 that were located there. And we are going to try to
11 schedule the second walk-through opportunity to remove the
12 children's items from the home. The children, by the way,
13 Your Honor, are residing with Ms. Roglieri.



14 And then there is another individual residing or
15 occupant of the premises, Ms. Oliver, Linda Oliver, who has
16 a number of items located within the premises. And I have
17 been coordinating with Ms. Oliver. Basically a -- kind of
18 coordinating the ability for her to be there and to remove
19 her items from the premises as well as at the same time have
20 my professionals be going into the premises to inventory and
21 remove the bankruptcy estate items and secure them at a
22 different location to prepare them for a sale.

23 And we're going to be meeting again Sunday
24 afternoon at 12:00 to kind of hammer out the mechanics of
25 how we're going to implement all of that in a way that's

1 least intrusive to Ms. Oliver and allows her get done what
2 she needs to get done while at the same time allowing the
3 state to accomplish what it needs to accomplish. And so
4 those are the items on that.

5 Just as an aside, Your Honor, I did also, you
6 know, communicate with some parties and was able to solicit
7 an offer with respect to the real estate itself, which the
8 State of New York had put a tax lien on in December of 2023,
9 which was within the 90-day period of filing the bankruptcy
10 petition. However, it is a priority claim so I don't know
11 if it would be avoidable under 547.

12 But in any event, I've had some conversation with
13 Attorney Rock, who's counsel at the AG's office for the
14 state of New York. And in principal, we're having a
15 conversation about working for it on a sale if it comes to
16 fruition that would hopefully generate some benefit to the
17 estate.

18 And also from the estate administration
19 perspective, Your Honor, it is a very large house. It --
20 and the upkeep and maintenance of that house is very
21 expensive. And so we would not want to keep that real
22 estate in the estate very long.

23 THE COURT: Mr. Dribusch, can you give an idea of
24 the house situation in terms of liens, mortgages, equity,
25 value --

1 THE COURT: Does anyone have a problem with Mr.
2 Dribusch receiving more detailed specified orders regarding
3 the turnover situation? Does anyone have a problem with
4 that either on the phone or in the court? Ms. Penpraze?

5 MS. PENPRAZE: Lisa Penpraze, Office of the U.S.
6 Trustee. No, Your Honor. We believe that the trustee has
7 the statutory authority already. But given the number of
8 people involved, different entities involved, and some of
9 the sensitivities with the case, Mr. Dribusch consulted with
10 me and we both agree that it would be prudent for him to
11 have some additional orders. That way there's no question
12 when he's at the property going into the property.

13 We were really scrambling this week to get a lot
14 done. And when I say "we", it's mostly Mr. Dribusch. You
15 know, when he went up there subsequent to Mr. Roglieri being
16 detained and found the property virtually open, he really
17 had to do a lot of work to line up the professionals to get
18 in there and do what they had to do. Of course without --
19 we didn't know about security and what not and the
20 possibility that he would trip alarms and there would be the
21 -- you know.

22 So there's complexities to the trustee going in,
23 especially because this case is different on a couple of
24 levels, one that it's a residence. It's not, you know,
25 Joe's Garage. It's someone's house. And because of the

1 circumstances, that someone isn't there to open the door and
2 say, okay, Mr. Dribusch, come on in like he had done
3 previously. So that's why I think it's very prudent for the
4 trustee to get whatever comfort orders he needs that
5 reinforce to third parties, yes, this individual is the
6 trustee, he has these statutory powers, and it's
7 memorialized in the court's order.

8 THE COURT: Mr. Dribusch, why don't you take a
9 shot at drafting what you need? I'm going to assume -- does
10 anyone want to see these orders before they come in? I'm
11 going to assume that they're more or less unique, expensive
12 housekeeping orders to assist the trustee in doing what you
13 have to do.

14 Meanwhile, the other part of this motion, we've
15 scheduled a 105 hearing for Wednesday regarding an
16 interesting series of events that were -- where all the
17 parties are familiar with. Mr. Levine filed an entity, a
18 Prime and an 11. Mr. Van Tol has moved to dismiss that.
19 You have tried to trump Mr. Van Tol by withdrawing the
20 motion to dismiss.

21 And your papers today that you've submitted
22 attempt to deal with that. But my question, why wouldn't
23 that just simply wait until next Wednesday when we're
24 dealing with the entirety of the problem?

25 MR. DRIBUSCH: Well, a couple of things, Your

EXHIBIT C

EXHIBIT D

7:36

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Christian Dribush >

Text Message • SMS
Tue, Jun 4 at 9:05 PM

I followed up with Ms Roglieri attorney and tentative scheduled Thursday afternoon for her to retrieve remaining items for children. Thought I would try to get it done when you were out.

Also gate is closed but you only need to push open.

I will try to have locks rekeyed tomorrow and provide you with a key.

Wed, Jun 5 at 1:00 PM

Locksmith will be at 49 North this afternoon

40

Ok I'm at work and won't be home late but my cleaning lady might be there as she helps me with my dog etc. Thanks for letting me know. Also thanks for working out the gate it made me feel safe last night

Wed, Jun 5 at 5:33 PM

I left the key with the house keeper. It works on the front door and side door by "Man cave"



Text Message • SMS



Christian Dribush

6/10/24

Thank you so much for letting me know.

c Wanted to let you know that Ms. Roglieri has left, so you can return whenever you want.

Good afternoon Christian, I know your coming at 3pm and I said I should be out by 2:30 I'm running a few min behind, should be out of your way by 2:45